

# Jackson County Conservation District

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April 29, 2008

Donald Silawsky  
Office of Petroleum Reserves  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, D.C. 20585-0301

donald.silawsky@hq.doe.gov

RE: Scoping for the SPR SEIS; Richton

Dear Mr. Silawsky:

As an Agency of the State of Mississippi, this District did send to your office, on the 17<sup>th</sup> Day of December, 2007, a Resolution, (copy attached), requesting your office to provide this District a "hard" (printed) copy of the relevant EIS and associated documentation regarding same.

None has been forthcoming.

On the 11<sup>th</sup> day of April, 2008, the undersigned attended the public scoping sessions and subsequent public hearing regarding the Supplemental EIS for the proposed Richton project. In the course of the sessions, I personally posed questions of concern to:

David F. Johnson, Director, Planning and Engineering Office	
Robert Kulti	(Station 2)
Lisa Nicholson	(Station 2)
Yadrana Mansoor	(Station 3)
Ralph Christ	(Station 4)
Ian Frost	(Station 4)
Wayne Elias	(Station 5)
Paul Tilley	(Station 5)
Bill Bozzo	(Station 5)
Joyce Teerling (sp?)	(Station 6)
David Folse	(Station 6)
Linfdsy Partush	(Station 7)

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Each of whom personally received my name, email address and cell phone number. Each informed me they would answer the questions in a timely manner, so that, with the answers to the questions posed, the District could provide helpful input regarding the proposed changes to the original EIS, (which we have not received a copy of), and the proposed changes for the portion directly affecting Jackson County, Mississippi (at the scoping meeting we received a c.d. containing portions thereof – none of which addressed our concerns).

Of immense concern to the District, are the two proposed pipelines (48" slurry disposal line, and 36" dual purpose – raw water intake, and oil transport line), their proposed construction, routing, and safety features.

Specific questions which have not been answered are as follows:

- Proposed operating pressure of each pipeline
- Provisions for emergency cut-off valves for each pipe
- Provisions for accumulators or surge ponds for each emergency cut-off valve
- Location and general design of safety detectors for pipeline leaks or rupture
- Size, number, type and location of raw water intake pumps, and booster pumps for raw water line, petroleum line, and slurry line
- Identification of chemicals used as biocides to prevent marine growth in the raw water line; in particular for the line proposed to originate in Jackson County.
- Quantity of Ammonium Sulfite proposed to be mixed with the slurry.
- Provisions for aeration of the slurry to decrease the hypoxic/nitrogenous effect of discharge, as proposed
- Difference between the integrity of the oil delivery pipeline and the slurry pipeline. (Your EIS states failure of the oil delivery pipeline has a function of distance factored in, the slurry/intake pipelines do not).
- Operating temperatures (and ground conduction temperatures of the oil and slurry pipelines; e.g. entry and termination temperatures

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During the course of our inquiry, Messers Johnson and Elias both stated that the slurry pipeline will have a cement liner to protect against abrasion/erosion of the pipe. Neither could tell me if the liner would decrease the effective inner diameter of the pipe, calling for increased pressure and velocity for the effluent, or if the steel pipe would be greater than 48" i.d.

No one could tell us the width of the right-of ways proposed to be taken through Jackson County' however David Folse did state that the construction rights-of-way could be up to 350' for each line through unstable soil.

The District wishes to bring to your attention that the proposed routing for the pipeline(s) is contiguous to the present Plantation Pipeline, from George County, to Bayou Cassotte Industrial Area. The Plantation Pipeline was in place long before there were environmental/ archeological/ wetland laws.

After entering Jackson County from George County, for approximately 2.8 miles to Polktown Road, the proposed route crosses known aboriginal sites. The next 17.7 miles (From Polktown Road to the Black Creek Reservoir – a local government owned and operated thermal pollution control facility, the pipelines will be predominately in the Little Black Creek flowway/floodplain. The next 2.6 miles will be in or under the Black Creek Reservoir, entailing 4 levee crossings, and being under or adjacent to a levee for about 4,600 feet. The next 4.1 miles or so, from the Black Creek Reservoir to Saracenia Road in the Helena Community is predominately in the Little Black Creek floodplain/flowway. The next 4 miles, under Interstate 10, to the North Margin of the Escatawpa River is predominately through an extension of the "Sweet Meadow", an extremely biologically diverse wet pine savannah region, traversed by 4-mile creek (a tributary to Little Black Creek and the Pascagoula and Escatawpa Rivers) The next 5 miles will entail two levee crossings (water supply canal for former International Paper, Old U.S. 90, New U.S. 90, CSX railroad, a portion of the Kreole community, and numerous public roads. After crossing the CSX Railroad, the pipeline route again enters an ecologically diverse wet pine

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savannah, extending South adjacent to the Bangs Lake area of the Grand Bay National Estuarine Research Reserve. We end our narrative here, at the North end of Chevron U.S.A. property, and East of the indefinite proposed Pipeline relocations.

This generalized description of the proposed route is provided you to emphasize to you the failure in the present EIS to properly address the fact that the majority of the proposed pipeline is through unstable, delicate, hydric soils, the disturbance of which will adversely affect "our natural resources, our wildlife, and public lands." We are particularly concerned about the probability of a major saline spill on these remote, delicate lands, as its effects would be immediate, significant and deleterious.

To quote Rick Clark, of the National Park Service, Department of Interior, in the original comments to the 1992 EIS:

**Wetlands, Water Quality, etc.**

The DEIS states in numerous places that analysis of impacts to certain biological resources would not be covered in the DEIS since additional assessments are required such as Sections 401 and 404 of the Clean Water Act and several Executive Orders. **A statement from DOE that they plan to obtain the necessary permits is not adequate to stipulate that sufficient analysis has been conducted.** In order to fully evaluate this proposal, detailed information pertaining to these resources must be made available. **Until these additional assessments are completed, a full evaluation of the DEIS is not possible.** (Emphasis added)

Sincerely,  
(O/S)

John M. Ford, Deputy Commissioner  
Jackson County Soil and Water Conservation District  
jmf3911@gmail.com (228) 217 5367

ATTACHMENT: RESOLUTION of 12/17/07

# **R E S O L U T I O N**

**WHEREAS** the **JACKSON COUNTY SOIL AND WATER CONSERVATION DISTRICT** is a distinct governmental subdivision of the **STATE OF MISSISSIPPI** (§69-27-7 and §69-27-35 Miss. Code 1972); and:

**WHEREAS** the **JACKSON COUNTY SOIL AND WATER CONSERVATION DISTRICT**, in its Legislative Mandate is charged (§69-27-3 [d] Miss. Code 1972), among other things, with the duty to:

...provide for the conservation of the water and soil resources of this state, and for the control and prevention of soil erosion in this state, and thereby to preserve natural resources..., preserve wildlife, protect the tax base, protect public lands, and promote the health, safety, prosperity, and general welfare of the people of this state....

and:

**WHEREAS**, the **JACKSON COUNTY SOIL AND WATER CONSERVATION DISTRICT** has recently learned that the United States Department of Energy is considering a plan to pump 50 million gallons of water per day from the Pascagoula River; to use the water to wash out a salt dome in Perry County, MS; and to return the used water via a pipeline to a location South of Horn Island, in Jackson County, Mississippi; and

**WHEREAS**, no public hearings have been held on this plan in Jackson, George, or Greene Counties to describe this plan or to advise the people of these counties of this project; of its proposed impact on the Pascagoula River; and of the expected impact on the environment of these counties; and its impact on the natural resources, preservation of wildlife, the tax base, public lands, and the health, safety, prosperity, and general welfare of the people of this state; and

**WHEREAS**, the only public hearing near these three counties was reportedly held in Hinds County, MS (which is in Central Mississippi and has no part of the Pascagoula River in it) and that hearing was held on October 19, 2005, which was a mere 51 days after Hurricane Katrina devastated South Mississippi, and the people of South Mississippi were trying to recover from that disaster, thereby depriving the people of South Mississippi an opportunity to hear firsthand of the plan and to voice opinions on the plan; and

**WHEREAS**, the **JACKSON COUNTY SOIL AND WATER CONSERVATION DISTRICT** is concerned about the permanent damage that the Richton Salt Dome

Project could cause to the Pascagoula River and to all of South Mississippi; and

**WHEREAS**, the JACKSON COUNTY SOIL AND WATER CONSERVATION DISTRICT believes that the people of Jackson County are entitled to public hearings held in their county, with full notice of reasonable dates, times, and places, of those hearings;

**NOW THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE JACKSON COUNTY SOIL AND WATER CONSERVATION DISTRICT:**

1. That the findings of fact recited in the preamble hereof are hereby found and declared to be true and correct, to the best of the DISTRICT'S knowledge and belief.

2. That the Commissioners of the JACKSON COUNTY SOIL AND WATER CONSERVATION DISTRICT, of Jackson County, Mississippi, hereby respectfully ask Senator Trent Lott, Senator Thad Cochran, Representative Gene Taylor, and the United States Department of Energy, and all other agencies, Federal, State, and Local, having oversight of this project, to take whatever action may be necessary to provide public hearings in Jackson County, Mississippi, on the proposal to remove 50 million gallons of water per day from the Pascagoula River and to pump saline water through the coastal counties of Mississippi, to a point South of Horn Island, so that the people of South Mississippi may have a real chance to be informed and to comment on said project.

3. That the JACKSON COUNTY SOIL AND WATER CONSERVATION DISTRICT, further asks of said officials that any environmental impact statement which has been prepared, or is to be prepared, on said project, that hard copies (printed and bound) be made available to this DISTRICT's office, to the public

libraries of this county and on line on the internet, so that every citizen of this county may have an opportunity to review same (and, if no comprehensive environmental impact statement has been prepared, the District hereby requests that same be prepared, to inform the citizens of this county of what is expected to happen to the quality of their lives in this county, if the Richton Salt Dome Project becomes a reality).

4. That this resolution shall be made a part of the Minutes of the DISTRICT, and that copies of this resolution shall be sent to the officials identified herein and to other interested officials and individuals.

**ON MOTION** made by Commissioner **JOHN BULLOCK** and seconded by Commissioner **AUDICE SHELTON**, to adopt the foregoing resolution, and the question being put to a roll call vote, the result was as recorded:

<b>Luther B. Goff</b>	District One	Voted <b><u>AYE</u></b>
<b>Sue Welch</b> (ABSENT)	District Two	Voted <b><u>N/A</u></b>
<b>Audice Sleton</b>	District Three	Voted <b><u>AYE</u></b>
<b>John Bullock</b>	District Four	Voted <b><u>AYE</u></b>
<b>Vacant</b>	District Five	Voted <b><u>N/A</u></b>

The motion having received the affirmative vote of all of the Commissioners present, the President of the District declared the motion carried unanimously, and the resolution adopted this the \_\_17th\_\_ day of December, A.D. 2007.

\_\_\_\_\_(S) BENNY GOFF, PRESIDENT\_\_\_\_\_  
**PRESIDENT OF THE**  
JACKSON COUNTY SOIL AND WATER CONSERVATION DISTRICT

**ATTEST:**

\_\_\_\_(S) AUDICE SHELTON, SECRETARY\_\_\_\_\_  
**SECRETARY**